

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

*In re*

**STANADYNE LLC, *et al.*,<sup>1</sup>**

**Debtors.**

**Chapter 11**

**Case No. 23-10207 (TMH)**

**(Jointly Administered)**

**Objection Deadline: October 11, 2023**

**SIXTH MONTHLY FEE STATEMENT OF HUGHES HUBBARD & REED LLP  
AS COUNSEL FOR THE DEBTORS FOR COMPENSATION FOR PROFESSIONAL  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES  
INCURRED FOR THE PERIOD FROM AUGUST 1, 2023  
THROUGH AND INCLUDING AUGUST 31, 2023**

<b>Name of Applicant</b>	<b>Hughes Hubbard &amp; Reed LLP</b>
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	March 28, 2023 <i>nunc pro tunc</i> to February 16, 2023
Period for which compensation and reimbursement is sought:	August 1, 2023 through August 31, 2023
Amount of Compensation sought as actual, reasonable and necessary:	\$12,849.75
80% of Compensation sought as actual, reasonable and necessary:	\$10,278.80
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$934.20

This is a(n) X monthly \_\_\_\_\_ interim \_\_\_\_\_ final application. No prior application has been filed with respect to this Fee Period.

1. The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors' headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

**PRIOR APPLICATIONS**

<b>Dated Filed / Docket No.</b>	<b>Period Covered</b>	<b>Requested (\$)</b>		<b>Approved (\$)</b>		<b>Order Entered</b>
		<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>	
5/1/2023 D.I. 251	2/16/23- 3/31/23	\$1,099,950.00	\$372.09			
6/2/2023 D.I. 330	4/1/23- 4/30/23	\$530,203.50	\$124.62			
6/14/2023 D.I. 365	2/26/23- 4/30/23	\$1,630,153.50	\$496.71	\$1,629,312.00	\$496.71	7/17/23 D.I. 450
7/5/2023 D.I. 419	5/1/23- 5/31/23	\$667,390.50	\$171.42	Pending	Pending	
7/28/2023 D.I. 478	6/1/23- 6/30/23	\$386,995.50	\$69.72	Pending	Pending	
8/31/2023 D.I. 547 (as corrected by D.I. 551)	7/1/23- 7/31/23	\$455,634.00	\$309.36	Pending	Pending	
9/14/2023 D.I. 568	5/1/23- 7/31/23	\$1,510,020.00	\$550.50	Pending	Pending	

**SUMMARY OF BILLING BY PROFESSIONAL  
AUGUST 1, 2023 THROUGH AND INCLUDING AUGUST 31, 2023\***

<b>Timekeeper Name</b>	<b>Position</b>	<b>Department</b>	<b>Year of Admission</b>	<b>Year of Law School Graduation</b>	<b>Hourly Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Christopher Gartman	Partner	Corporate Reorganization	2008	2007	\$1,057.50	6.90	\$7,296.75
<b>Partner Total</b>						<b>6.90</b>	<b>\$7,296.75</b>
Jeffrey S. Margolin	Counsel	Corporate Reorganization	2003	2002	\$1,125.00	2.50	\$2,812.50
<b>Counsel Total</b>						<b>2.50</b>	<b>\$2,812.50</b>
Elizabeth A. Beitler	Associate	Corporate Reorganization	2017	2016	\$945.00	2.90	\$ 2,740.50
<b>Associate Total</b>						<b>2.90</b>	<b>\$2,740.50</b>
<b>Total Hours</b>						<b>12.30</b>	
<b>Total Requested</b>							<b>\$12,849.75</b>

**Blended Hourly Rate:      \$1,044.70**

\*The Monthly Fee Statement reflect a ten percent (10%) reduction from Hughes Hubbard's standard rates. This results in a reduction of \$1,427.75. The Monthly Fee Statement also reflects a voluntary write-off of \$1,077.75 in fees. Overall, reductions to the Debtors total \$2,505.50 from Hughes Hubbard's customary fees charged other clients.

**STATEMENT OF FEES BY PROJECT CATEGORY**  
**AUGUST 1, 2023 THROUGH AND INCLUDING AUGUST 31, 2023** <sup>2</sup>

<b>Project Name</b>	<b>Hours</b>	<b>Fee Amount</b>
Asset Analysis, Recovery and Valuation	0.70	\$780.75
Assumption and Rejection of Leases and Contracts	0.20	\$211.50
Business Operations	0.20	\$211.50
Employee Benefits and Pensions	0.90	\$951.75
Employment and Fee Applications	1.90	\$2,137.50
Meetings and Communications with Creditors	0.40	\$423.00
Real Estate	8.00	\$8,133.75
<b>TOTAL HOURS</b>	<b>12.30</b>	
<b>TOTAL REQUESTED</b>		<b>\$12,849.75</b>

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2. The subject matter of certain time entries may be appropriate for more than one project category. In such instances, time entries generally have been included in the most appropriate category. Time entries do not appear in more than one category.

**SUMMARY OF ACTUAL AND NECESSARY EXPENSES**

<b>Disbursement Summary</b>		
<b>Expense Category</b>	<b>Service Provider,<sup>3</sup> if Applicable</b>	<b>Amount</b>
Delaware Filing Fee	Continental Corporate Services, Inc.	\$838.00
Research Services	Pacer	\$96.20
<b>TOTAL</b>		<b>\$934.20</b>

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3. Hughes Hubbard & Reed LLP may use one or more service providers. The service provider identified herein is the service provider for the category described.

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THROUGH AND INCLUDING AUGUST 31, 2023**

Hughes Hubbard & Reed LLP (“Hughes Hubbard”), counsel to Stanadyne LLC and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this sixth monthly fee statement (this “Monthly Fee Statement”) for compensation for professional services rendered and expenses incurred for the period from August 1, 2023 through and including August 31, 2023 (the “Fee Period”). In support of the Monthly Fee Statement, Hughes Hubbard respectfully states as follows:

**Background**

1. On February 16, 2023 (the “Petition Date”), the Debtors commenced their bankruptcy cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”). The Debtors are operating their businesses as debtors-in-possession pursuant to section 1108 of the Bankruptcy Code.

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1. The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors’ headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

2. On March 6, 2023, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed a Committee of Unsecured Creditors (the “Committee”) [D.I. 78]. No trustee or examiner has been appointed in these Chapter 11 Cases.

3. On March 28, 2023, the Court entered the *Order Pursuant to Sections 105(a), 330, and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-2 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 136] (the “Interim Compensation Order”).

4. On March 28, 2023, the Court entered the *Order Authorizing the Retention and Employment of Hughes Hubbard & Reed LLP as Attorneys for the Debtors Effective as of the Petition Date* [D.I. 137], authorizing the retention and employment of Hughes Hubbard as the Debtors’ counsel, *nunc pro tunc* to February 16, 2023.

### **Relief Requested**

5. By this Monthly Fee Statement and in accordance with the Interim Compensation Order, Hughes Hubbard makes this application for (i) allowance of compensation as an administrative expense of the Debtors’ estates in the amount of \$12,849.75 for reasonable and necessary professional services rendered, (ii) payment of compensation in the amount of 80% thereof (in the amount of \$10,279.80) and (iii) payment of \$934.20 for actual and necessary expenses incurred.

#### **a. Compensation Requested**

6. Attached hereto as Exhibit A is a detailed itemization, by project category, of all services performed by Hughes Hubbard with respect to the Chapter 11 Cases during the Fee Period. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of

the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

7. The timekeepers who rendered services related to each category are identified in Exhibit A, along with the number of hours for each individual and the total compensation sought by each category. All services for which Hughes Hubbard requests compensation were performed for, or on behalf of, the Debtors.

**b. Expense Reimbursement**

8. Hughes Hubbard incurred out-of-pocket expenses during the Fee Period in the amount of \$934.20. Attached hereto as Exhibit B is a description of the expense actually incurred by Hughes Hubbard in the performance of services rendered as counsel to the Debtors.

9. In accordance with section 330 of the Bankruptcy Code, Hughes Hubbard seeks reimbursement only for the actual cost of such expenses to Hughes Hubbard. Hughes Hubbard submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

**Valuation of Services**

10. Professionals of Hughes Hubbard have expended a total of 12.30 hours in connection with this matter during the Fee Period.

11. The amount of time spent by each of the professionals providing services to the Debtors for the Fee Period is set forth in Exhibit A. The rates of Hughes Hubbard reflect a ten percent (10%) discount from normal hourly rates of compensation for work of this character. This results in a reduction of \$1,427.75. The invoice also reflects a voluntary write-off of \$1,077.75 in fees. Overall, reductions to the Debtors total \$2,505.50 from Hughes Hubbard's customary fees charged other clients. The reasonable value of the services rendered

by Hughes Hubbard for the Fee Period as counsel for the Debtors in the Chapter 11 Cases is \$12,849.75.

12. Hughes Hubbard believes that the time entries included in Exhibit A attached hereto and the expense breakdown set forth in Exhibit B attached hereto are in compliance with the requirements of Local Rule 2016-2.

13. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

**Certificate of Compliance and Waiver**

14. The undersigned representative of Hughes Hubbard certifies that she has reviewed the requirements of Local Rules 2016-2 and that the Monthly Fee Statement substantially complies with such rule. To the extent that the Monthly Fee Statement does not comply in all respects with the requirements of Local Rule 2016-2, Hughes Hubbard believes that such deviations are not material and respectfully requests that any such requirements be waived.

**Notice**

15. Notice of this Monthly Fee Statement has been provided to: (i) the U.S. Trustee; (ii) counsel to the Committee; (iii) counsel for the prepetition secured lenders; and (iv) all parties required to be given notice pursuant to the Interim Compensation Order. Hughes Hubbard submits that no other or further notice is necessary.



WHEREFORE, Hughes Hubbard respectfully requests that the Bankruptcy Court

(i) approve the Monthly Fee Statement and (ii) grant such further relief as is just and proper.

Dated: September 21, 2023  
New York, NY

/s/ Kathryn A. Coleman

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